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PATENT

AMENDMENT D (IN RESPONSE TO PAPER NO. 20051219  
(OFFICE ACTION DATED JANUARY 4, 2006))

REMARKS

Claims 1-6, 8-14, 17 and 19-20 are pending in this case. In the section above, claims 1, 9 and 17 have been amended. Based on the following remarks, it is respectfully submitted that claims 1-6, 8-14, 17 and 19-20 are allowable.

Amendments to Claims

Independent claims 1, 9 and 17 have been amended to clearly articulate and expressly require that the wireless device is in the user's direct and physical control. As indicated in the previous response filed October 17, 2005, the aforementioned amendments do not add new subject matter, but rather serve to clarify the claimed subject matter. Accordingly, support for the amendments may be found, among other places, on page 5, lines 1-24 and on page 8, lines 16-17 of Applicants' written description.

§ 102 Rejection of Claims

Claims 1-6, 8-14, 17 and 19-20 are rejected under 35 U.S.C. § 102(e) as being anticipated by Kobayashi, U.S. Patent No. 6,633,759 ("Kobayashi"). This rejection is respectfully traversed and it is submitted that these claims recite subject matter which is not anticipated by and is patentable over Kobayashi.

Independent Claims 1, 9 and 17

As stated in the previous response, Kobayashi appears to be directed to, among other things, two separate and unique embodiments of communicating between a mobile communication device (e.g., a cellular phone) and an external device (e.g., a personal computer). (FIGS. 1, 9 and 12). In one embodiment, Kobayashi teaches that a user may directly control and manipulate a cellular phone to start software installed on a remotely located PC for subsequently display on the

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cellular phone. (Abstract, Fig. 9). In a separate and unrelated embodiment, Kobayashi teaches that the process is reversed: a PC under the direct and physical control of a user is manipulated to run software located on an externally-located cellular phone (e.g., in a pocket or briefcase) for subsequent display on the PC.

Claim 1 requires, among other things, that the wireless device be in the direct and physical control of a user. At the same time, the claim requires that the interface client display content. Thus, to the extent that the first embodiment of Kobayashi can be compared to the subject matter of claim 1, it is respectfully noted that the cellular phone must be equated to both the wireless device and the interface client. That is to say that the cellular phone is the only device in the direct and physical control of a user and the only device that displays content. Similarly, to the extent that the second embodiment of Kobayashi can be compared to the subject matter of claim 1, it is respectfully noted that the PC must be equated to both the wireless device and the interface client for the same reasons articulated above.

It is respectfully submitted that it is error to suggest that one device can function as both the claimed wireless device and interface client and still anticipate claim 1. For instance, the doctrine of claim differentiation as applied to elements of a claim and the conspicuous use of the article "a" in introducing both the wireless device and the interface client supports the notion that the wireless device and interface client are, in fact, two separate and unique devices. Moreover, the claim specifically requires that the first wireless communication path operably couples the wireless device to the interface client, thereby suggesting that the wireless device and interface client may not be construed as one device.

For this reason alone, it is respectfully submitted that claim 1 is not anticipated by Kobayashi and that the rejection must be withdrawn. Accordingly,

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the claim is submitted for immediate allowance.

With respect to independent claim 9, the relevant remarks made above with respect to claim 1 are respectfully reasserted. For this reason alone, claim 9 is also submitted for allowance. Additionally, it is respectfully submitted that the Examiner's citation to column 10, line 65 – column 11, line 10 of Kobayashi is in error because the citation is with respect to the first embodiment of Kobayashi which does not teach or suggest communication, directly or indirectly, with a remote source (i.e., a server). In contrast, claim 9 requires, among other things, that the wireless device is adapted for receiving the content along a second wireless communication path from a remote source and conveying the content to the interface client along the first wireless communication path.

For argument's sake, however, even if the Examiner's citation were relevant to the claimed subject matter, it is respectfully submitted that Kobayashi fails to teach or suggest formatting content for display on an interface client based on the submitted information from the interface client. In contrast, the cited portion of Kobayashi merely teaches that "when data is sent from the PC 1 to the cellular phone 2, it is preferable to process the data by changing the character font or removing unnecessary data in accordance with the size of the screen of the cellular phone 2." (Col. 10, line 65 – Col. 11, line 3). Thereafter, it is explained that the user can use arrow keys on the cellular phone to scroll through the display data.

Unlike the Examiner's contention, the cited portion of Kobayashi fails to teach or suggest that the cellular phone (i.e., the interface client) submits information such that any device can format the content based on the submitted information. At most, it indicates that the cellular phone, after receiving the data, may, in one embodiment, independently format the data for proper display without

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first submitting any information to a separate wireless device.

If the Examiner maintains this rejection, Applicants' attorney respectfully requests a specific citation to the column(s) and line numbers where Kobayashi teaches the claimed limitation. Because the reference fails to anticipate one of the elements of Applicants' subject matter, it is respectfully submit that Claim 9 is in proper condition for allowance.

With respect to claim 17, the relevant remarks stated above with respect to claims 1 and 9 are respectfully reasserted. That is, Kobayashi fails to teach or suggests a wireless device separate and distinct from the interface client. Moreover, it is respectfully submitted that column 8, lines 47-55 and column 9, lines 40-53 discuss the first embodiment of Kobayashi. Because the first embodiment of Kobayashi fails to teach or suggest communication with a remote source and for those reasons articulated above, claim 17 is also submitted for immediate allowance.

Dependent Claims 2-6, 8, 10-14, 19 and 20

The relevant remarks stated above with respect to claims 1, 9 and 17 are respectfully repeated with respect to dependent claims 2-6, 8, 10-14, 19 and 20. Because the aforementioned dependent claims depend from allowable independent claims and because they contain novel and nonobvious subject matter, it is respectfully submitted that claims 2-6, 8, 10-14, 19 and 20 are further in condition for allowance.

Conclusion

In light of the present amendments, claims 1-6, 8-14, 17 and 19-20 remain pending in this case remain pending in this case. Based upon the foregoing remarks, it is respectfully submitted that these claims are allowable, and

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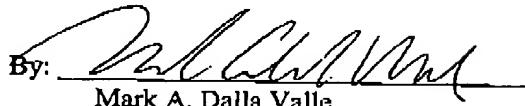
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reconsideration and early allowance of these claims are requested.

Respectfully submitted,

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Atty. Docket: 11602.00.0005

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